

November 1, 2007

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
Docket Control
(via FCC electronic filing system)

Ex Parte Submission

RE: Petition of the Cellular Telecommunications & Internet Association for an Expedited Declaratory Ruling -- WT Docket No. 05-194; an Petition for Declaratory Ruling filed by SunCom Operation Company L.L.C. and Opposition and Cross—Petition for Declaratory Ruling, Filed by Debora Edwards – WT Docket No. 05-193

Dear Ms. Dortch:

Attached to this letter is an ex parte submission of the new AARP Public Policy Institute report entitled, “[Breaking Up Is Hard to Do: Consumer Switching Costs in the U.S. Marketplace for Wireless Telephone Service](#)”, as AARP’s ex parte filing in WT Dockets 05-193 and 05-194, both concerning Early Termination Fees in Wireless Service Contracts. (Pub ID: 2007-18)

The switching costs that consumers are charged when they change wireless telephone service providers, such as early termination fees, generally harm consumers by increasing prices and making markets less competitive. This report, prepared by the AARP Public Policy Institute finds significant evidence that the national wireless carriers strategically pursue and manage a full range of switching cost opportunities.

Should you have any questions, please do not hesitate to contact the Marti T. Doneghy of our Federal Affairs staff at (202) 434-3800.

Respectfully Submitted,

/s/ David Certner

David Certner
Legislative Counsel and Legislative Policy Director
Government Relations and Advocacy